

## Nelson, Scott

---

**From:** Nelson, Scott  
**Sent:** Tuesday, January 30, 2018 8:49 AM  
**To:** 'Base Metal Recycling'  
**Subject:** RE: Dear US Primary Exporter of Hazardous Waste

Thank you for your response.

We will use this email for our record of Base Metal Recyclings non-exporting of SLABs during 2017.

Thanks again.

**From:** Base Metal Recycling [mailto:info@basemetalrecycling.com]  
**Sent:** Monday, January 29, 2018 6:56 PM  
**To:** Nelson, Scott <Nelson.Scott@epa.gov>  
**Subject:** Re: Dear US Primary Exporter of Hazardous Waste

Hi,

Base Metal Recycling closed its doors at the end of 2016. The company filed bankruptcy in April of 2017. There was no business transacted for 2017 nor will there be in the future. Do you still need an annual report filled out?

Please let me know. Thank You.

On Mon, Jan 29, 2018 at 12:21 PM Nelson, Scott <Nelson.Scott@epa.gov> wrote:

Dear US Primary Exporter of Hazardous Waste:

Our records indicate that during 2017 you had a valid consent(s) for the export of hazardous waste. This letter is a reminder that your 2017 Annual Report summarizing your exports of hazardous waste during calendar year 2017 is due on March 1, 2018. Even if you did not export during 2017, you must submit an Annual Report referring to your consents for export of hazardous waste, noting that you had zero exports for each consent.

The regulatory requirements for Annual Reports are listed at 40 CFR § 262.83(g) Annual Reports not meeting these requirements, as applicable, will be returned as deficient. **Failure to file a timely and accurate annual report of Hazardous Waste exports can result in a penalty of up to \$32,500 per day.** You may access these regulations by clicking on [https://www.ecfr.gov/cgi-bin/text-idx?SID=2bb9edbec9f3d88caef586d3f21e24f4&mc=true&node=se40.28.262\\_183&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=2bb9edbec9f3d88caef586d3f21e24f4&mc=true&node=se40.28.262_183&rgn=div8)

507 Jan 30 2018

U.S. EPA would like to encourage you to utilize the Annual Report function in EPA's Waste Import Export Tracking System (WIETS) to create and submit your 2017 Annual Report. While use of the function is not yet mandatory, using it will greatly assist you in submitting your 2017 Annual Report. The WIETS Annual Report function will build a draft report based on all the Acknowledgement of Consent (AOC) letters issued to you that authorize shipments over part or all of 2017. The annual report will use the data in the system for those consents to list all waste streams by foreign receiving facility. You will then enter the number of shipments and total quantity export for each listed waste stream to complete your report, sign it and then submit it in the system. For those exporters working with a notice preparer, that same notice preparer can use the Annual Report function to prepare the Annual Report and forward it to you for review and signature just as the preparer did for the export notice. Lastly, as noted in the recordkeeping regulations in 40 CFR 262.83(i)(2), exporters may satisfy the recordkeeping requirements by retaining electronically submitted documents in WIETS.

Should you still choose to submit a paper export annual report, it must be mailed no later than March 1, 2018 to my attention at one of the following addresses:

Scott Nelson and/or Eva Kreisler, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, 1200 Pennsylvania Avenue NW., Washington, DC 20460.

Please note that this is the last year where submitting paper annual reports will be allowed. Use of the WIETS Annual Report function will be mandatory starting in calendar year 2019 for your 2018 Annual Report submittal.

Regards,

Eva H. Kreisler, Attorney-Advisor

International Compliance Assurance Division

Office (202) 564-8186

[kreisler.eva@epa.gov](mailto:kreisler.eva@epa.gov)

\*\*\*Have a question about your notice after looking in WIETS at <https://cfext.epa.gov/wiets/>? Still confused about requirements after checking <https://www.epa.gov/hwgenerators/basic-information-resource-conservation-and-recovery-act-rcra-export-and-import>? Email [RCRANotifications@epa.gov](mailto:RCRANotifications@epa.gov) \*\*\*

Address:

Office of Enforcement and Compliance Assurance  
Office of Federal Activities  
International Compliance Assurance Division (2254A)  
Environmental Protection Agency

1200 Pennsylvania Avenue, NW.  
Washington, DC 20460

Help EPA fight pollution by reporting environmental violations on EPA's website at  
<http://www.epa.gov/compliance/complaints/index.html>

This email, including attachments, contains information that is confidential and it may be protected by the attorney-client or other privileges. This email, including attachments, contains information that is intended to be conveyed only to the designated recipient(s).